

**UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
SHERMAN DIVISION**

DAMONIE EARL, LINDA RUGG, ALESA  
BECK, TIMOTHY BLAKEY, JR.,  
STEPHANIE BLAKEY, MARISA  
THOMPSON, MUHAMMAD MUDDASIR  
KHAN, ELIZABETH COOPER, JOHN  
ROGERS, VALERIE MORTZ-ROGERS,  
and LAKESHA GOGGINS, each individually  
and on behalf of all others similarly situated,

*Plaintiffs.*

v.

THE BOEING COMPANY,  
SOUTHWEST AIRLINES CO.,

*Defendants.*

Civil Action No. 4:19-cv-00507-ALM

**PLAINTIFFS' MOTION TO WITHDRAW PIERCE BAINBRIDGE AS CO-COUNSEL  
AND REQUEST FOR TERMINATION OF ELECTRONIC NOTICE**

Plaintiffs, respectfully request that the law firm Pierce Bainbridge Beck Price & Hecht LLP ("Pierce Bainbridge"), and following attorneys ("Withdrawing Attorneys"), be permitted to withdraw as counsel of record for Plaintiffs in the above-referenced case:

1. Andrew Michael Williamson.
2. Andrew Jay Lorin.
3. Andrew Wolinsky.
4. David Hecht.
5. Barron McGinnis Flood.
6. Michael Pomeranz.

As of April 15, 2020, none of the Withdrawing Attorneys will remain associated with Pierce Bainbridge. Lead counsel for Plaintiffs, Yavar Bathaee and Brian Dunne of Bathaee Dunne LLP, and their local counsel, Elizabeth L. DeRieux of Capshaw DeRieux LLP, will continue to appear as counsel on behalf of Plaintiffs in this action. Therefore this withdrawal will not be cause for any

delay and will not prejudice Plaintiffs or Defendants. Accordingly, and pursuant to Local Rule CV-11(c)-(d), Plaintiffs request that Pierce Bainbridge, and its Withdrawing Attorneys be permitted to withdraw as attorney of record, and that Clerk of the Court terminate the Withdrawing Attorneys' receipt of electronic notices for this matter.

Dated: April 14, 2020

Respectfully submitted,

/s/ Andrew M. Williamson

Andrew M. Williamson (D.C. 1011095)

**PIERCE BAINBRIDGE BECK**

**PRICE & HECHT LLP**

601 Pennsylvania Avenue, NW

South Tower, Suite 700

Washington, DC 20004

202-318-9001 – Telephone

202-463-2103 – Facsimile

[awilliamson@piercebainbridge.com](mailto:awilliamson@piercebainbridge.com)

Andrew J. Lorin (NY 2368249)

[alorin@piercebainbridge.com](mailto:alorin@piercebainbridge.com)

Andrew Wolinsky (NY 4892196)

[awolinsky@piercebainbridge.com](mailto:awolinsky@piercebainbridge.com)

David Hecht (NY 4695961)

[dhecht@piercebainbridge.com](mailto:dhecht@piercebainbridge.com)

Michael Pomerantz (NY 2920932)

[Michael.m.pomerantz@gmail.com](mailto:Michael.m.pomerantz@gmail.com)

Barron McGinnis Flood (NY 5585765)

[bflood@piercebainbridge.com](mailto:bflood@piercebainbridge.com)

**PIERCE BAINBRIDGE BECK**

**PRICE & HECHT LLP**

277 Park Avenue, 45th Floor

New York, New York 10172

Tel: (212) 484-9866

Yavar Bathaee (NY 4703443) (Lead Counsel)

[yavar@bathaeedunne.com](mailto:yavar@bathaeedunne.com)

Brian J. Dunne (CA 275689)

[bdunne@bathaeedunne.com](mailto:bdunne@bathaeedunne.com)

**BATHAEE DUNNE LLP**

430 Park Avenue

New York, NY 10022

Tel: (213) 534-7501

Elizabeth L. DeRieux (TX 05770585)  
ederieux@capshawlaw.com  
**CAPSHAW DERIEUX, LLP**  
114 E. Commerce Ave.  
Gladewater, TX 75647  
Tel: (903) 845-5770

*Attorneys for Plaintiffs*

**CERTIFICATE OF CONFERENCE**

As required by Local CV-7(h), undersigned counsel for Plaintiffs exchanged more than a half dozen emails with respective counsel for Defendants (between April 13, 2020 and April 14, 2020) in an effort to meet and confer and obtain Defendants' consent to this motion. However, counsel for Defendants were not available for a phone call on April 14<sup>th</sup> and thus, under the circumstances, the parties were not able to confer on the telephone with sufficient time to enable Plaintiffs to timely request withdrawal prior to April 15<sup>th</sup>. As of the time of this filing, undersigned counsel was unable to obtain the Defendants' concurrence in the relief sought in this motion. Lead counsel for Plaintiffs consent to the relief sought in this motion.

/s/ Andrew M. Williamson  
Andrew M. Williamson

**CERTIFICATE OF SERVICE**

I hereby certify that all counsel of record who have consented to electronic service were served with a copy of this document through this Court's CM/ECF system and pursuant to the local rules on April 14, 2020.

/s/ Andrew M. Williamson  
Andrew M. Williamson